

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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ISACCO JACKY SAADA,	:	
	:	<u>PROTECTIVE ORDER</u>
Petitioner,	:	
	:	1:18-CV-05292 (AMD) (RML)
-against-	:	
	:	
MORIN GOLAN,	:	
Respondent.	:	
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IT IS HEREBY ORDERED that:

1. The Petitioner and Respondent in this case (together, the “Parties”) and their counsel, as well as the attorney(s) for the child in the Family Court custody and family offense proceeding before the Honorable Judith Waksberg, Case Number 309699 (the “Family Court Proceeding”), will be (a) provided with a copy of Dr. Karen Surowiec’s October 31, 2023 report of her final psychological evaluation of B.A.S., as supplemented (the “Surowiec Report”), and (b) permitted to use the Surowiec Report in the Family Court Proceeding on the terms below.
2. This Court sealed the Surowiec Report pursuant to the October 30 and 31, 2023 minute entries in this case, and provided a copy to Judge Waksberg as recorded in a November 13, 2023 minute entry.
3. Absent express authorization of the Family Court otherwise, this Protective Order limits the use and observation of the Surowiec Report by the Parties, their counsel, and the attorney(s) for the child, as set forth below. Any application to the Court for authorization of an exception to any of the below terms must be made in writing and upon notice to all Parties.

4. The Parties, their counsel, and the attorney(s) for the child may not copy, duplicate, upload, or provide a copy of the Surowiec Report to anyone other than the individuals referenced in paragraphs 3, 6, and 7 of this Protective Order.
5. Pursuant to this Protective Order, the Parties, their counsel, and attorney(s) for the child may use the Surowiec Report solely in the Family Court Proceeding, subject to the rulings of Judge Waksberg in that case.
6. The Parties must not allow any third party to view the Surowiec Report.
 - a. For purposes of this Protective Order, the term “third party” does not include witnesses called to testify in the Family Court Proceeding or paralegals, legal interns, clerical staff, administrative staff, supervisory staff, or any other member of an attorney’s law firm or law office that is performing work in the Family Court Proceeding.
 - b. The attorneys in the Family Court Proceeding are responsible for ensuring that any person excluded from the definition of “third party” in the preceding paragraph who receives a copy of the Surowiec Report is made aware of the contents of this order. The attorneys and Parties in the Family Court Proceeding are responsible for maintaining the confidentiality of the Surowiec Report.
7. If the Parties, their counsel, or the attorney(s) for the child retain an expert in connection with the Family Court Proceeding, the expert may view and use the Surowiec Report, provided that the expert agrees to keep it confidential and to use it solely in connection with the Family Court Proceeding. The party who retains the expert is responsible for instructing the expert of the contents and consequences of this Order. The expert must not copy, upload, or otherwise reproduce the Surowiec Report or disclose it to any third party.
 - a. At the conclusion of the expert’s services, the expert must destroy all copies of the Surowiec Report and provide confirmation of such destruction to the Parties. If the

Surowiec Report has been provided to the expert on a physical disc or drive, the expert must return the Surowiec Report to the party or the attorney who retained the expert at the conclusion of the expert's services without retaining any copies.

8. Any written transcripts, summaries, or other work product that is derivatively obtained from the Surowiec Report must not be disseminated to third parties other than as allowed by paragraphs 3, 6, and 7.
9. The Surowiec Report may not be used for training purposes, presentations, continuing legal education courses, or for any purpose other than representation of the Parties in the Family Court Proceeding.
10. FAILURE TO COMPLY WITH THIS ORDER MAY BE PUNISHABLE BY SANCTIONS AND/OR CONTEMPT OF COURT.

August 8, 2024

Date

s/Ann M. Donnelly

Hon. Ann M. Donnelly
United States District Judge